



October 18, 2011

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Ex Parte

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Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: WC Docket No. 10-90; GN Docket No. 09-51; WC Docket No. 07-135; WC Docket No. 05-337; CC Docket No. 01-92; CC Docket No. 96-45; WC Docket No. 04-36

Dear Ms. Dortch:

On October 15, I spoke with Zac Katz, Chief Counsel and Senior Legal Advisor to Chairman Genachowski, and separately with Angela Kronenberg, Wireline Legal Advisor to Commissioner Clyburn. On October 17, I spoke again with Ms. Kronenberg. And today I spoke separately with Rebekah Goodheart of the Wireline Competition Bureau. The purpose of these discussions was to address the draft universal service and intercarrier compensation reform order now circulating, as well as America's Broadband Connectivity Plan submitted by a coalition of companies, including Verizon.

In particular, I discussed with Mr. Katz and Ms. Kronenberg potential broadband universal service support distribution mechanisms (short-term and long-term), how those mechanisms may be implemented, and the impact on Verizon. I also discussed the potential phase-out of legacy high-cost universal service support and the need for a corresponding phase-out of legacy eligible telecommunications carrier obligations. I discussed with Mr. Katz, Ms. Kronenberg, and Ms. Goodheart the jurisdiction of VoIP traffic, and the end-state and legal theories for intercarrier compensation reform. In addition, I discussed the need for additional end-user pricing flexibility as well a reasonable opportunity for some carriers to recover a portion of access revenue reductions from temporary universal service funding.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Kathleen Grillo".